

## SECTION 4

### HEALTH AND SAFETY

**4-1. Purpose.** This section describes USACE health and safety policy, responsibilities, and criteria for the effective management of HTRW projects. This includes providing comprehensive and site-specific safety and health criteria to be used by USACE and contractors in developing Safety and Health Programs (SHP) and Site Safety and Health Plans (SSHPs) for all HTRW site activities conducted by USACE or its contractors.

**4-2. Authority.** The development and implementation of appropriate SHPs and SSHPs for HTRW site operations are mandated by OSHA 29 CFR 1910.120/29 CFR 1926.65, and is applicable to all USACE and contractor personnel engaged in on-site activities associated with Superfund, DERP, SFO, civil works projects, and any other HTRW projects.

**4-3. Responsibilities.** HTRW health and safety program execution, document preparation, and the review and approval responsibilities of specific USACE elements (e.g., HQUSACE, OE MCX, HTRW CX, HTRW design districts, divisions, and geographic districts, etc.) shall be implemented as described in ER 385-1-92.

**4-4. Policy.** All USACE elements shall follow ER 385-1-92 and comply with (and specify contractor compliance with) OSHA standards 29 CFR 1910 (general industry) and 29 CFR 1926 (construction). In addition, the Department of the Army, USACE, and its contractors must comply with EM 385-1-1, "Safety and Health Requirements Manual," throughout all investigative, design, and RA phases of HTRW projects.

a. Training.

(1) It is Corps policy that prior to conducting on-site HTRW activities (intrusive or non-intrusive) in contaminated areas (exclusion zone or contamination reduction zone) of an HTRW site, all USACE and contractor personnel shall have successfully completed the following:

(a) formal 40-hour HTRW health and safety training course;

(b) 3 days of actual on-site training under the guidance of a trained and experienced supervisor; and

(c) 8 hours of refresher training annually.

(2) All on-site supervisors shall complete the above requirements and an additional 8-hour supervisor's course covering at least the following topics:

- (a) employer's safety and health program,
- (b) PPE program,
- (c) spill containment program, and
- (d) health hazard monitoring procedures and techniques.

(3) For additional important information on training, refer to CESO-I memorandum dated 13 May 1994, subject: "HTRW Safety and Health Training Courses and Medical Surveillance Required by OSHA standards 29 CFR 1910.120 and 1926.65." This document can be found in Appendix F. Refer also to Section 5, "Training."

b. Medical Surveillance and Record Keeping. All USACE personnel performing on-site HTRW activities (intrusive or non-intrusive) in contaminated areas (exclusion zone or contamination reduction zone) of an HTRW site shall be evaluated for inclusion in a medical surveillance program that meets the requirements of 29 CFR 1910.120 (f), ER 385-1-40, and EP 385-1-58. Generally, if employees meet the medical surveillance inclusion criteria, exams can be given on a biennial frequency (every other year) for most USACE HTRW staff (refer to CESO-I memorandum "HTRW Medical Surveillance Program Inclusion and Frequency Criteria), Located in Appendix F). OSHA standards 29 CFR 1910.120/1926.65 require that occupational exposure monitoring and medical surveillance records be maintained for a period of 30 years. Office of Personnel Management regulation 5 CFR Part 339 specifies personnel record-keeping procedures be consistent with OSHA standards. Such records are to be maintained in the individual's employee medical folder (SF-66D). The geographic district SOHO is the proponent responsible for medical surveillance.

c. Documentation. Copies of certificates of training, medical surveillance, and respirator fit testing of all USACE project personnel required to enter contaminated areas of the site should be available on site for examination by OSHA.

d. Staffing. USACE commands shall staff an Industrial Hygienist and safety professional(s) in the SOHO. These personnel shall support safety and occupational health (SOH) aspects of in-house preliminary assessments and site investigations. They shall also provide support during construction activities. In addition, an IH shall be staffed in the HTRW design district's engineering component to serve as a technical team member in developing and reviewing contractor or in-house investigations and designs.

e. Submittals. ER 385-1-92 requires several SOH documents be developed and implemented, as applicable, for all HTRW activities. The content of the Health and Safety Design Analysis (HSDA) required by ER 385-1-92 is used by the design district along with CEGS 01351, "Safety, Health, and Emergency Response (HTRW/UST)," to develop the final

safety, health, and emergency response specifications for an HTRW construction solicitation. The requirements for the contractor's SSHP are described in the safety, health, and emergency response specification section of the contract. CEGS-01351 and ER 385-1-92 specify that the contractor requirement for a separate accident prevention plan (APP), required by FAR clause 52.236-13, shall be considered met if the contractor has integrated the requirements of the APP into the SSHP submission. Contractor compliance with EM 385-1-1 will be observed.

f. USACE Oversight of "PRP Lead" Projects - EPA Superfund Program. OSHA requirements concerning developing and implementing an SHP and SSHP are applicable to USACE and contractor personnel engaged in on-site activities at PRP enforcement sites. USACE oversight officials on PRP sites must review the PRP's SSHP prior to conducting on-site activities. Comments and concerns regarding the PRP's SSHP must be submitted to the EPA RPM. Site prerequisite training and medical surveillance applicable to USACE oversight officials shall be met prior to any oversight activities taking place. USACE oversight officials shall adopt and comply with all applicable requirements of the PRP SSHP.

g. OE and HTRW Combined Waste Sites. On sites where both OE and HTRW wastes exist, the RE should ensure that the SSHP is properly coordinated among the various Corps and contractor elements. See Section 10, "Ordnance and Explosives," for further information.